

**REMARKS**

**Introduction**

Claims 30-63 are pending in this application. Claims 1-29 have been cancelled, without disclaimer or prejudice. Claims 30-58 have been rejected. Claims 59-63 have been added. The newly added claims and the amendments are fully supported by the specification as originally filed. No new matter has been introduced. Reconsideration of this application for allowance of all pending claims is hereby respectfully requested in view of the amendments to the claims and the following remarks.

**Claim Rejection – 35 U.S.C. § 102**

Claims 30-36, 44-53, 56, and 58 have been rejected under 35 U.S.C. §102 (b) as being anticipated by Clark (U.S. Patent No. 6,345,243). The Applicants respectfully traverse the rejection.

The amended claims 30, 45, 50, and 51 recite “by crawling a web site via following links to additional pages” as a means to obtain content in a first language for translation. The Applicants respectfully submit that Clark does not disclose this feature. According to Clark, content subject to translation is stored as files in a file system. Clark does not teach or suggest the capability of crawling a web site by following links to additional pages to access the content to be translated, as recited in claims 30, 45, 50, and 51.

It is well-settled that a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Since Clark fails to disclose and teach the above feature, as recited in claims 30, 45,

50, and 51, the Applicants respectfully submits that Clark does not anticipate claims 30, 45, 50, and 51. Thus, claims 30, 45, 50, and 51 are patentable. Therefore, the Applicants respectfully request that the rejection of claims 30, 45, 50, and 51 under 35 U.S.C. §102(e) be withdrawn.

Claims 31-36, 44, 46-49, 51-53, 56, and 58 depend from claims 30, 45, 50, and 51, respectively. Thus, they are patentable for at least the same reasons as discussed with respect to claims 30, 45, 50, and 51 and for the additional features recited therein. Therefore, the Applicants respectfully request that the rejection of claims 31-36, 44, 46-49, 51-53, 56, and 58 under 35 U.S.C. §102(e) be withdrawn.

The newly added claims 59, 60, 61, and 62 recite “storing content intercepted from a web server providing the content to a user browsing a web site”. The Applicants respectfully point out that Clark does not teach this feature either. Therefore, the Applicants respectfully submit that claims 59-63 are not anticipated by Clark and therefore are patentable.

#### **Claim Rejection – 35 U.S.C. § 103**

Claims 37-43 have been rejected under 35 U.S.C. §103 (a) as being unpatentable over Clark, in view of Cartus (U.S. Patent 6,993,473). The Applicants respectfully traverse the rejection.

Claims 37-43 depend from claim 30. As discussed above, Clark does not disclose “crawling a web site via following links to additional pages”, as recited in claim 30. The Applicants respectfully point out that Cartus does not teach this feature either. Thus, the combination of Clark and Cartus does not cure the deficiency of Clark. Thus, claim 30 is not obvious over Clark in view of Cartus. Claims 37-43 depend from claim 30. Therefore, claims 37-43 are not obvious over Clark in view of Cartus for at least the same reasons as discussed

with respect to claim 30 and for the additional features recited therein. The Applicants respectfully request that rejection of claims 37-43 under 35 U.S.C. §103 (a) be withdrawn.

Claims 54 and 55 have been rejected under 35 U.S.C. §103 (a) as being unpatentable over Clark, in view of Hargrave et al. (U.S. Patent No. 5,724,593). The Applicants respectfully traverse the rejection.

Claims 54 and 55 depend from claim 51. As discussed above, Clark does not disclose “crawling a web site via following links to additional pages”, as recited in claim 51. The Applicants respectfully point out that Hargrave et al. do not teach this feature either. Thus, the combination of Clark and Hargrave et al. does not cure the deficiency of Clark. Thus, claim 51 is not obvious over Clark in view of Cartus. Claims 54 and 55 depend from claim 51. Therefore, claims 54 and 55 are not obvious over Clark in view of Hargrave et al. for at least the same reasons as discussed with respect to claim 51 and for the additional features recited therein. The Applicants respectfully request that rejection of claims 54 and 55 under 35 U.S.C. §103 (a) be withdrawn.

Claim 57 has been rejected under 35 U.S.C. §103 (a) as being unpatentable over Clark, in view of Official Notice. Claim 57 depends from claim 51. As discussed, the amended claim 51 recites “crawling a web site via following links to additional pages”, which is not taught by Clark. That, Clark does not anticipate claim 51 or make claim 51 obvious. Since claim 57 depends from claim 51, claim 57 is not anticipated or made obvious by Clark. Therefore, the Applicants respectfully request that rejection of claim 57 be withdrawn in light of the amended claim 51.

The newly added claims 59, 60, 61, and 62 recite "storing content intercepted from a web server providing the content to a user browsing a web site". The Applicants respectfully point out that neither Clark nor any of the secondary prior art references teaches this feature. Therefore, the Applicants respectfully submit that claims 59-63 are not obvious over Clark in view of any of the cited secondary prior art references and therefore patentable.

**Conclusion**

Having fully responded to all matters raised in the Office Action, Applicants submit that all claims are in condition for allowance, an indication for which is respectfully solicited. If there are any outstanding issues that might be resolved by an interview or an Examiner's amendment, the Examiner is requested to call Applicants' attorney at the telephone number shown below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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